

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Northern Division)

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

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Master Docket No. 103CV-00318 (RDB) DEPUTY

IN RE TITANIUM DIOXIDE ANTITRUST
LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**STIPULATION AND ORDER
REGARDING EAST COAST COLORANTS LLC'S
MOTION TO INTERVENE**

East Coast Colorants LLC d/b/a Breen Color Concentrates ("Breen"); Plaintiffs Haley Paint Company and Isaac Industries, Inc. (collectively, "Plaintiffs"); and Defendants E.I. du Pont de Nemours and Company ("DuPont"), Huntsman International LLC ("Huntsman"), and Kronos Worldwide, Inc. ("Kronos") and Millennium Inorganic Chemicals Inc. (collectively, "Defendants") stipulate as follows:

1. On July 13, 2011, Breen moved to intervene in the above action as a named plaintiff and proposed class representative. (Dkt. 164). Plaintiffs' counsel support this motion.
2. Breen agrees that it will be bound by all previous rulings of this Court, including Case Management Order No. 1 and the Scheduling Order.
3. Breen agrees that as a new plaintiff in this action, it will adopt the Consolidated Complaint as its active complaint against Defendants. Breen also agrees that the Defendants' respective Amended Answers to that Consolidated Complaint will serve to join issue with Breen's claims against Defendants, and Defendants will not have to file any additional Answers

with respect to Breen's claims.

4. Plaintiffs and Defendants agree that they will not use Breen's appearance as a new plaintiff to seek changes to any of the previous rulings by this Court.

5. Without admitting anything regarding the validity of Breen's claims or its adequacy as a class representative, Defendants consent to Breen's intervention in the above action.

6. Nothing in this stipulation either authorizes or prohibits Breen and Plaintiffs from seeking to assert additional claims at a later time.

Respectfully submitted,

Dated: July 29, 2011

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Millennium Inorganic Chemicals Inc.*

IT IS HEREBY ORDERED:

1. East Coast Colorants LLC d/b/a Breen Color Concentrates is added as a plaintiff and named putative class representative to the above action; and
2. The claims asserted in the Consolidated Complaint shall be deemed as asserted by East Coast Colorants LLC d/b/a Breen Color Concentrates.
3. The Defendants' Amended Answers to the Consolidated Complaint shall be deemed to have been filed and served on East Coast Colorants LLC d/b/a Breen Color Concentrates on the respective dates that they were served on Plaintiffs Isaac Industries, Inc. and Haley Paint Company.
4. East Coast Colorants LLC d/b/a Breen Color Concentrates shall be bound by all previous rulings by this Court, including Case Management Order No. 1 and the Scheduling Order.

IT IS FURTHER ORDERED that the Clerk of this Court is directed to add East Coast Colorants LLC d/b/a Breen Color Concentrates as a plaintiff in this matter and, as such, said plaintiff shall be added to this Court's docket and in the caption in all future filings and documents in this case.

Dated:

July 29, 2011



Richard D. Bennett, U.S.D.J.